

Akin Gump

STRAUSS HAUER & FELD LLP

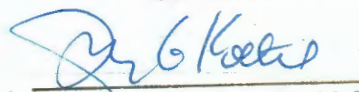
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July 28, 2022

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED
SO ORDERED


7/28/22 John G. Koeltl, U.S.D.J.

Re: *United States v. Hayes, et al.*, 20 Cr. 500 (JGK)

Dear Judge Koeltl:

We respectfully submit this letter on behalf of our client, Arthur Hayes, to request that the Court (1) exonerate bail and direct the Clerk of Court to return \$1,500,000 to Mr. Hayes and (2) direct Pretrial Services to return Mr. Hayes's Hong Kong identity card to Akin Gump so that we can forward it to Mr. Hayes.

On or about April 9, 2021, in compliance with the conditions of release set by Magistrate Judge Aaron in the District of Hawaii, Mr. Hayes executed a \$10,000,000 appearance bond, secured by \$1,500,000 deposited with the Court. (ECF No. 63.) At the government's request, on April 19, 2021, we provided Mr. Hayes's Hong Kong identity card to Pretrial Services. (*See Ex. A* (Letter from P. Altman to L. Harmon).) The appearance bond provides that the bond shall be satisfied and the security released when the defendant reports to serve a sentence. (ECF No. 63.)

On February 24, 2022, Mr. Hayes entered a plea of guilty to Count I of the Indictment (ECF No. 2), and on May 20, 2022, the Court sentenced Mr. Hayes to two years' probation, with a six-month term of home detention with location monitoring, and required him to pay a \$100 special assessment and report to the Probation Department in the Southern District of New York within seventy-two hours. On May 23, 2022, Mr. Hayes reported to the Probation Department in the Southern District of New York as instructed by the Court. On May 27, 2022, Mr. Hayes paid the \$100 special assessment. On July 11, 2022, Mr. Hayes reported to the Probation Department as directed in the Southern District of Florida, and he is currently serving his home detention at his residence in Miami, Florida. Accordingly, pursuant to the terms of the appearance bond, we request that the Court order the exoneration and release of bail and direct the Clerk of Court to return the \$1,500,000 deposit to Mr. Hayes.



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Additionally, Mr. Hayes has satisfied the terms of his pretrial release, and we request that the Court issue an order directing Pretrial Services to return Mr. Hayes's Hong Kong identity card to Akin Gump so that we can forward it to Mr. Hayes.

We appreciate the Court's attention to these matters.

Respectfully submitted,

James Joseph Benjamin, Jr.

Enclosure.

cc: AUSAs Samuel Raymond and Nathan Rehn (*via ECF*)